WEEKLY REPORT

1. Completed Project Activities to date

The project activities completed to date are listed below:

Tanks completed to date are all located in the Area of Concern 1N (AOC 1N) which is in the NW portion of the Falcon Refinery. AOC 1N is located on the property which lies north-west of the intersection of FM 2725 and Bishop road in Ingleside, TX.

The activities completed for tanks listed below include the removal and transfer of tank bottoms into Tank 26, decontamination, demolition and the removal/transportation of the tanks from the Falcon Refinery to Commercial Metals (CMC recycling) in Corpus Christi, TX:

- Tank 2
- X1
- X2
- X3

Sampling and Waste Characterization

Preliminary sampling on Tanks 17, 18, 19, 20, 21, 22, 23, & 24 for the purpose of characterizing waste was conducted on September 9, 2011. Additional sampling for characterizing waste was conducted on September 22, 2011. Sampling results are expected to be received by the latter part of next week - September 26 to 30, 2011.

2. PROJECT ACTIVITIES TO BE COMPLETED (Projected Schedule and Established Deadlines)

A. <u>Demolition / Relocation of Structures</u>

We plan to relocate/ demolish a small building that lies adjacent to the road which provides limited access to Tanks 17 – 24. The structure as it is currently located impedes access between the refinery roads and the tanks. Current access to the tanks is restricted to a narrow space between several risers and a live transformer and will not accommodate the 18 wheeler that will be used to load and transport the demolished tanks to the recycling facility. Also limiting access to Tanks 17-24 is a grey power panel and live transformer that is parallel and south of the road is a gray conduit that carries 440 volts to pump(s) that is located to the east. There is high risk for electrocution & fire if the conduit is damaged. We have decided that we will not load metal over the conduit and into an 18 wheeler toward the south field. The safe alternative is to try to move or demolish the building so the 18 wheeler can pivot his turn before the transformer and risers and back in straight to the east.

B. Removal of Tank Tops

The following tanks are scheduled for the partial removal of the tops. The removal of tops will enable work to proceed within each tank as it will remain intact with approximately 4 to 5 feet of sidewall and floor; Mobilization of the shear and trailer to remove the tops will occur in the middle of next week - September 26 to 30, 2011.



Tank 18 -

Tank 19 -

Tank 20 -

Tank 21 -

Tank 22 -

Tank 23 -

Tank 24 -

C. Removal and Transfer of sludge to Tank 26

Sludge removal from Tank 27 - This activity is currently in progress.

Sludge removal from Tank 10 - This activity will resume late next week.

Sludge removal from Tanks 17, This activity will resume late next week.

Sludge removal / demolition of Tank N1

Sludge removal / demolition of Tank N2

Sludge removal / demolition of Tank Y1

Removal of Tank 30 - no activity

Treatment of water in Tank 26 – We are currently awaiting for a formal response from the TCEQ on their review of a waste water discharge permit that has been submitted on behalf of the Falcon Refinery. We have discovered through preliminary discussions with the TCEQ that the request for a permit has been denied by the Waste Water Program at TCEQ based on a scenario that groundwater is shallow (0 - 0.5 feet of depth) and an insufficient soil horizon to prevent the treated wastewater from reaching the groundwater.

Treatment of water in Tank 7 – no activity

3. COMPLETED PROJECT ACTIVITIES FOR WEEK OF SEPTEMBER 19-23, 2011

A. Removal of Tank Bottoms

The removal of tank bottoms from refinery Tanks and the transfer of that material into Tank 26 was completed this week for the tanks that are listed below:

- X1
- X2
- X3

The completed tank removals were all located in AOC 1N.

B. Demolition and Recycling

The demolition and recycling of the tanks listed below was also completed this week. The tanks were sheared, loaded into an 18 wheeler at the Falcon Refinery and transported to a recycling facility on Agnes street in Corpus Christi, TX (Commercial Metals - CMC recycling).

- X1
- X2
- X3

C. Removal and Transfer of sludge to Tank 26

D. Sampling and Waste Characterization

Preliminary sampling on Tanks 17, 18, 19, 20, 21, 22, 23, & 24 for the purpose of characterizing waste was conducted on September 9, 2011. Additional sampling for characterizing waste was conducted on September 22, 2011. Sampling results are expected to be received by the latter part of next week - September 26 to 30, 2011. A decision for the disposal destination will be made based on the results.

4. Activities Planned for Next Week

Tank 27

Tank 10

E. <u>Disposal of Sludge</u>, Metal and Sediment

This material includes metal and dry sediment as well as K169 listed waste that meets the universal treatment standards.

5. <u>Issues Encountered</u>;

Residual sludge in large tank is more difficult to remove and requiring more time to transfer due to the significant amounts of rust and debris in the material;